March 15, 2013

Teresa Kubo, NEPA Coordinator Region 10
Environmental Protection Agency,
805 SW Broadway, Suite 500
Portland, Oregon, 97205

RE: Bonneville Power Administration, I-5 Corridor Reinforcement Project
Double-circuit towers on wetlands and Oregon alternatives

Ms. Kubo:

We are writing you today because we believe Bonneville Power Administration (BPA) did not provide a full range of alternatives, including complete and substantive analyses both quantitatively and qualitatively as required by law in any Environmental Impact Statement.

Double-circuit towers not studied

Under a Freedom of Information Act (FOIA) request to BPA asking for studies on double-circuit towers on wetlands along its West alternative (BPA-owned existing right-of-way), we received a response stating there were "no documents responsive to our request."

In 2009 we were told by BPA that putting towers side-by-side along their West alternative would be a reliability problem. They told us using their West alternative would be putting all their eggs in one basket if an airplane hit the lines or if there were a terrorist attack.

On August 18, 2011, we received a response to several questions from Maryam Asgharian, our BPA contact person for this project. One question we asked was "Has there ever been a tower collapse or line failure along their existing easement (West alternative). Her response was *"We have not seen a tower collapse along this line. We have seen insulators fail or be vandalized. If this occurs, it would likely be along one span (between two towers), rather than the whole line. Once we are aware of an issue like this we can repair it within hours."*

There is clearly not much of a reliability problem based on the 70-year history of this transmission corridor.

Using BPA's West alternative would save 74 million dollars by BPA's estimate. This would also minimize the impact to the environment. Double circuiting through wetlands would result in zero long-term net loss of wetlands. BPA's new double-circuit design reduces the perceived health

risks, as found on BPA's web site[1] and in their Draft Environmental Impact Statement[2] (DEIS) for the I-5 Corridor Reinforcement Project.

BPA's new double-circuit tower design

- Uses fewer towers: *"4 per mile in some places"*
- Costs less: *"saves BPA an average of $18,000 to $270,000 per tower"*
- Uses less right-of-way and creates less Electromagnetic Field levels: as noted on page 3-2, section 3.2.1Tower Types in the DEIS.

Double circuiting for the entire right-of-way would place towers on the center of the right-of-way instead of near the edges, which would increase the distance from homes, businesses, and schools, would use half as many towers and would not require removal of as much vegetation along the edge of the existing corridor.

Pearl Alternatives (Oregon) not given a thorough Environmental Assessment as required under the National Environmental Policy Act.

For approximately ten years, the I-5 Corridor Reinforcement Project was a study of Oregon (Pearl) and Southwest Washington (Troutdale) alternatives. In 2009, just days before an announcement went to the public, BPA made the decision to not carry the Pearl alternatives through a full Environmental Assessment and made the decision to only study the Troutdale alternatives. In late 2009, our board submitted a FOIA request for the Agency Decision Framework (Version 6)[3] discussing the prematurely dropped Pearl alternatives. From that documentation we learned that BPA planned to not let the Pearl alternatives "go public" for many reasons, most of which made little sense.

Two examples are the following:

1. BPA states the Pearl alternatives would impact 3,100 landowners, whereas the Troutdale alternatives impacts 7,700 landowners. Since the Pearl alternatives would impact less than half the number of landowners, why did BPA drop it?

2. BPA states concerns regarding a new river crossing at the Columbia River in Longview, *"requiring very tall towers up to 450 feet tall."* This should not be a concern because the existing transmission towers crossing the Columbia River in Longview are **over** 450 feet tall.

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1 BPA Engineers Build A Better Tower, Saving Millions: http://www.bpa.gov/news/newsroom/Pages/BPA-engineers-build-a-better-tower-saving-millions.aspx

2 http://www.bpa.gov/Projects/Projects/I-5/Pages/Draft-EIS.aspx

3 http://abetterway4bpa.org/index.php?option=com_docman&task=cat_view&gid=92&Itemid=77

Both the Troutdale and Pearl alternatives had similar scenarios, as stated in the Agency Decision Framework (Version 6).

"All Pearl routing alternatives would need to go through some residential areas," "would go through managed timber lands," "would go near or through established wildlife areas and near or on private airstrips,"

However, in the decision to only study the Troutdale alternative BPA stated that *"The Pearl alternatives do not offer a route on existing right of way, whereas the Troutdale plan does."*

In that case why didn't BPA choose an existing right-of -way, the West alternative, for its preferred alternative? We think this is the most reasonable choice. If BPA persists in its decision to waste millions of dollars and hundreds of acres and invade, take, and devalue the properties of private landowners by building a new transmission corridor, then it should also be considering the Pearl alternatives to find the route least damaging to private property owners.

BPA wrote *"a new line in either corridor* (Pearl or Troutdale) *would fully meet our electrical needs,"* and *"proposing and thoroughly analyzing up to 88 segments* (Pearl alternative and Troutdale alternative) *will send a clear message that we considered all possible routes and have selected the very best alternative."* We believe this is exactly what BPA should have done.

The current Draft Environmental Impact Statement is flawed without a full range of alternatives included. To provide a full range of reasonable alternatives, BPA should perform a complete environmental review and analysis of the Pearl alternatives and double-circuit towers on wetlands along the West alternative.

The Army Corps of Engineers must issue a permit for this project. BPA has only requested to permit one alternative, the Central Alternative, Option 1. Since BPA chose the Troutdale alternatives over the Pearl alternatives because Troutdale has an existing right-of-way, we demand that BPA requests a permit from the Army Corps of Engineers for its existing right-of-way, the West Alternative, using double circuit towers through wetlands.

We are asking that you work with us to ensure all alternatives, including double circuit towers and Pearl alternatives are given a complete and thorough analysis, both quantitatively and qualitatively by bringing these issues to light and commenting to Bonneville Power Administration and the Army Corps of Engineers during the public comment period for the Draft Environmental Impact Statement. Both of these comment periods end at noon, March 25.

Sincerely,

The Board of A Better Way for BPA

Cheryl Brantley—Chair

Ray Richards—Vice Chair/Treasurer

Paula Overholtzer—Secretary

Jan Davis—Membership

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Where to Comment

Bonneville Power Administration online: http://www.bpa.gov/Projects/Projects/I-5/Pages/Submit-Comments.aspx
Or by conventional mail
Bonneville Power Administration
I-5 Corridor Reinforcement Project
PO Box 9250
Portland, OR 97207
Voicemail: 800-230-6593

Army Corps of Engineers email to: steven.w.manlow@usace.army.mil
Re: Public Notice Comments on NWS-2011-346; BPA (I-5 Corridor Reinforcement Project)

Or by conventional mail
U.S. Army Corps of Engineers
Regulatory Branch
Attention: Mr. Steve Manlow
Post Office Box 3755
Seattle, WA 98124-3755

Table 4-9 Comparison of Alternatives to Project Purposes

Alternatives	Use Ratepayer Funds Responsibly And Efficiently	Minimize Impacts To The Natural And Human Environment	Maintain BPA Transmission System Reliability And Performance	Meet BPA's Statutory And Contractual Obligations
West Alternative	About $385 million. Would be the least expensive because existing right-of-way is available for most of the length of the line. Some existing lines would need to be removed and replaced, which adds costs.	The project has been designed to minimize impacts to the environment where feasible, and mitigation measures are identified to avoid or reduce these impacts. Please see Table 4-10 for a comparison of the environmental impacts of the alternatives.	1. The project would increase the ability to serve the Portland/Vancouver metro area during summer and increase system flexibility should there be an interruption in the operation of one of the area's other transmission lines. It would also allow BPA to grant requests for transmission service while maintaining reliability of the electrical grid to BPA and industry standards. 2. Adds inherent risk to system reliability by placing the new line in the same corridor as other BPA lines transmitting power north-south.	Though BPA has no expressed contractual or statutory obligation to build the proposed project, the project would help BPA further its statutory mandates and tariff provisions that direct BPA to construct additions to the transmission system to integrate and transmit electric power and maintain system stability and reliability, as appropriate.
Central Alternative	About $459 million	Same as West Alternative	1. Same as West Alternative 2. N/A	Same as West Alternative
East Alternative	About $489 million. Would be the most expensive because it would be the longest route, and would require new right-of-way for most of its length.	Same as West Alternative	1. Same as West Alternative 2. N/A	Same as West Alternative
Crossover Alternative	About $442 million	Same as West Alternative	1. Same as West Alternative 2. Same as West Alternative	Same as West Alternative
No Action Alternative	No immediate costs would be incurred if the project is not built.	This alternative has the least environmental impacts. Please see Table 4-10.	Benefits of the project (increased system flexibility and capacity to Portland/Vancouver metro area in the summer) would not be gained. It would limit BPA's ability to provide service to new transmission requests because the capacity of existing lines in the area cannot accommodate the requests without compromising reliability of the system.	By not constructing the project, BPA would not be acting in furtherance of its applicable statutory mandates or tariff provisions.